



Allied Corporation
Law Department
P.O. Box 2245R
Morristown, NJ 07960-2245

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 1, 1985

Ms. Janet C. Feldstein
Site Investigation and Compliance Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Re: Allied Corporation - SCP - Newark and
Carlstadt, New Jersey - Amended Response
to 42 U.S.C. 9604(e) Information Request

Dear Ms. Feldstein:

By letter dated March 22, 1985, Allied Corporation ("Allied") responded to Mr. Librizzi's Information Request dated February 12, 1985 in connection with the Scientific Chemical Processing ("SCP") facilities in Newark and Carlstadt, New Jersey. Allied hereby submits an amended answer to Question No. 1 of the Information Request for Allied's Elizabeth, New Jersey facility.

The answer to Question No. 1 of the Information Request for Allied's Elizabeth, New Jersey facility (answers to the Information Request for our Elizabeth, New Jersey facility were provided in Attachment A of our March 22, 1985 response) is hereby amended to read as follows:

1. See Allied Corporation response dated September 28, 1984, as amended by letter dated May 1, 1985 to the EPA Information Request dated June 28, 1984 in connection with the Lone Pine Landfill (copy attached as Attachment A-1).

A copy of Allied's letter amendment dated May 1, 1985 to its Lone Pine response is enclosed herewith.

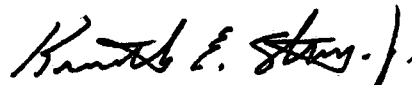
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Allied's letter amendment to its Lone Pine response provides the correct composition of Halar® water which is believed to have been transported from the Allied facility in Elizabeth, New Jersey to SCP. The composition of Halar water was incorrectly described in Allied's response dated September 28, 1984 to the Lone Pine Information Request.

If you have any questions concerning this amended response, please call me at (201) 455-3455, or if I am unavailable, Mr. W. F. Potter at (201) 455-3856.

Very truly yours,



Kenneth E. Stroup, Jr.
Attorney

KES:cp
Enclosure

cc: W. F. Potter (w/enc)



Allied Corporation
Law Department
P.O. Box 2245R
Morristown, NJ 07960-2245

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 1, 1985

Mr. John V. Czapor
Office of Emergency and Remedial Response
U.S. Environmental Protection Agency
26 Federal Plaza
Region II
New York, New York 10278

Re: Lone Pine Landfill - Amended Response to
42 U.S.C. 9604(e) Information Request

Dear Mr. Czapor:

After a careful review of the relevant documentation and information, including interviews conducted with Allied Corporation (formerly Allied Chemical Corporation) personnel, Allied submits this amended response to Mr. Librizzi's 42 U.S.C. 9604(e) Information Request dated June 28, 1984.

Allied responded to Mr. Librizzi's Information Request on September 28, 1984. Allied's response included the following description of Halar® water (as set forth in Attachment A, Section 3.A.I.b. of the response) which was believed to have ultimately been transported to the Scientific Chemical Processing ("SCP") facility in Newark, New Jersey:

Composition: (average ranges)

5 - 20%	Methanol (Methyl Alcohol)
0.1 - 0.5%	Chloroform
73.0 - 88.0%	Water
1.0 - 3.0%	Trichlorotrifluoroethane
0.1 - 0.4%	Sodium Carbonate
1.0 - 5.0%	Total Suspended Solids

trace: sodium trichloroacetate, sodium hydroxide and potassium carbonate

Based on Allied's recent review of relevant documentation and information, it was determined that the above-described composition of Halar® water represents the composition of Halar® water from about September 1978 to the present. No shipments of Halar® water having this composition were transported from our Elizabeth, New Jersey facility to SCP.

Our recent review further determined that the shipments of Halar® water that are believed to have been transported from our Elizabeth, New Jersey facility (see Attachment A(1) of Allied's response to Mr. Librizzi's Information Request) to SCP actually had the following composition:

Composition: (average ranges)

1.0 - 2.0%	Methanol
<0.02%	Chloroform
96.8 - 98.5%	Water
0.2 - 0.3%	Trifluorotrichloroethane
0.02 - 0.04%	Sodium Carbonate
0.2 - 0.5%	Total Suspended Solids

trace: sodium trichloroacetate, sodium hydroxide and potassium carbonate

This material is not a listed RCRA hazardous waste nor does it exhibit any of the RCRA hazardous waste characteristics (i.e., ignitable, corrosive, reactive or toxic).

If you have any questions concerning this amended response, please call me at (201) 455-3455, or if I am unavailable, Mr. W. F. Potter at (201) 455-3856.

Sincerely yours,



Kenneth E. Stroup, Jr.
Attorney

KES:cp

cc: W. F. Potter

ATTACHMENT A-1



Allied Corporation
Law Department
P.O. Box 2245R
Morristown, New Jersey 07960

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 28, 1984

Mr. John Czapor
Office of Emergency and Remedial Response
U.S. Environmental Protection Agency
26 Federal Plaza
Region 2
New York, New York 10278

Re: Lone Pine Landfill - 42 U.S.C. 9604(e)
Information Request

Dear Mr. Czapor:

This letter is in response to Mr. Librizzi's letter dated June 28, 1984 addressed to Allied Chemical Corporation, Elizabeth, New Jersey. Mr. Librizzi's letter requests that Allied Chemical Corporation (whose name has now been changed to Allied Corporation or "Allied") answer certain questions as to whether Allied waste materials were disposed of at the Lone Pine Landfill or whether any Allied waste materials were handled for Allied by Scientific Chemical Processing, Inc. ("SCP"). You previously agreed during our telephone conversation on September 6, 1984 (confirmed by my letter to you on that date) that our response with respect to possible transactions with SCP could be limited to the time period of 1975-1978. Allied's answers to the questions contained in Mr. Librizzi's letter are enclosed herewith as Attachment A.

With respect to Mr. Librizzi's information request regarding the Lone Pine Landfill, Allied desires to point out that on October 4, 1982, and in response to another EPA Region II information request regarding the Lone Pine Landfill, Allied informed EPA Region II that a search of available records had not discovered any information indicating that Allied waste materials were disposed of at the Lone Pine Landfill. In the course of conducting this latest search, Allied has reviewed this previous response to EPA II in addition to the search for documentation and information which formed the basis for our previous response and believes this previous response to be correct. A copy of this response is enclosed herewith as Attachment B to this letter for your review.

During Allied's search for documentation in connection with Mr. Librizzi's information request, Allied discovered documents indicating that Allied had a contract during the period of January 1, 1975 - January 17, 1977 with SCP for the reclamation of phosphoric acid and methanol from a waste stream (comprising

about 25% methanol, about 25% phosphoric acid and about 50% water) produced by Allied's former facility in Haledon, New Jersey. These waste materials are believed to have been transported in bulk to SCP. Allied had the first right of refusal to purchase the reclaimed methanol and phosphoric acid. The former facility in Haledon, New Jersey was sold to the Harmon Colors Corporation on January 17, 1977.

The testimony at the trial of SCP and its principals (i.e., U.S. v. Scientific Chemical Processing, Inc., et al. (D.N.J. Criminal No. 82-200)) established that shipments of drummed waste materials from SCP to the Lone Pine Landfill, however, were not initiated until the "middle" of 1977.

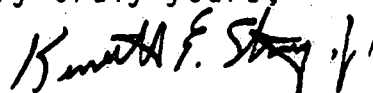
Therefore, in view of the date of the sale of the Haledon facility and the timing of SCP's taking materials to Lone Pine, Allied believes that waste materials from its (former) facility in Haledon, NJ were not taken to Lone Pine by SCP. Allied does not have any evidence of any other use of or connection to Lone Pine of this facility.

I believe that Allied's search has gone as far as it can go. Even so, Allied specifically requests that EPA Region II provide it with any evidence which EPA II contends demonstrates or suggests that Allied waste materials were or may have been disposed of at the Lone Pine Landfill. Allied will review further any such evidence and will inform EPA II of the results of any such further investigation based on the EPA evidence.

With respect to the information submitted in this response, Allied reserves any and all rights to which it is entitled, and does not in any way concede any liability with respect to the matters which are the subject of Mr. Librizzi's request for information. Allied also reserves the right to contest the government's authority to make the June 28, 1984 information request.

Should you have any questions concerning this response, please call me at (201) 455-3455 or, if I am unavailable, Mr. R. L. Fawcett at (201) 455-2891.

Very truly yours,



Kenneth E. Stroup, Jr.
Attorney

KES:cp
Enclosure

cc: R. L. Fawcett (w/att)

ATTACHMENT A

ANSWERS TO QUESTIONS CONTAINED IN
INFORMATION REQUEST

1. To the best of Allied's knowledge, information and belief, no Allied waste materials were transported to or disposed of at the Lone Pine Landfill.
2. Yes.

A. Elizabeth, New Jersey Facility

See Attachment A(1) for the dates on which waste materials from Allied's facility located in Elizabeth, New Jersey are believed to have been transported to Scientific Chemical Processing, Inc. ("SCP"). Attachment A(1) was derived from purchase orders, invoices, and weigh tickets apparently associated with transactions between Allied's Elizabeth, New Jersey facility and SCP. Addresses of both of the following SCP facilities appear on weigh tickets for the transactions listed in Attachment I:

Scientific Chemical Processing, Inc.
411 Wilson Avenue
Newark, New Jersey

or

Scientific Chemical Processing, Inc.
216 Paterson Plank Road
Carlstadt, New Jersey

All of the Allied Purchase Orders were issued to SCP at the Newark address. New Jersey Department of Environmental Protection manifests completed by Allied indicate all transactions on or after 5/5/78 involving Halar water resulted in the transportation of materials to the Carlstadt facility.

Notwithstanding the foregoing description of Allied records and based on information and belief, the shipments of Halar water listed in Attachment A(1) are believed to have ultimately been transported to the SCP facility located in Newark, New Jersey. SCP employees testified during the trial against Scientific Chemical Processing (i.e., U.S. v. Scientific Chemical Processing Inc., et al. (D.N.J. Criminal No. 82-200)) and its principals that Halar water from Allied's Elizabeth facility was always transported to Newark and disposed of into a sewer system.

Allied records indicate that the transactions listed in Attachment A(1) involving alpha pinene, a material having a BTU value approximately that of fuel oil, resulted in the shipment of materials to SCP's Carlstadt facility. Based on information and belief, these materials are believed to have ultimately been transported by SCP to the Solite Corporation in Saugerties, New York.

B. Haledon, New Jersey Facility

Available records indicate that Allied Chemical Corporation had a contract with Scientific Chemical Processing during the period from January 1975 until January 17, 1977 for the reclamation of phosphoric acid and methanol from a waste stream that was produced at Allied's former facility in Haledon, New Jersey. This facility was sold to the Harmon Colors Corporation on January 17, 1977. The facility continues to be operated by the Harmon Colors Corporation. The address for Scientific Chemical Processing is indicated as 216 Paterson Plank Road, Carlstadt, New Jersey on the available records.

Allied has no records regarding dates upon which waste materials from its former Haledon, New Jersey facility may have been handled by SCP, if any were in fact handled.

3. A. Elizabeth, New Jersey Facility

I a. Halar(R) Water, also known as Methanol Water

b. Composition: (average ranges)

5 - 20% Methanol (Methyl Alcohol)
0.1 - 0.5% Chloroform
1.0 - 3.0% Trichlorotrifluoroethane
0.1 - 0.4% Sodium Carbonate
1.0 - 5.0% Total Suspended Solids
trace: sodium trichloroacetate, sodium hydroxide
and potassium carbonate
73.0 - 88.0% Water

c. Source/Origin

This material is a mixture of two waste streams, the major one being waste water that is dewatered (centrifuged) from the batch reactor of Halar(R) product, after the reaction has been completed. Halar(R) is a co-polymer of chlorotrifluoroethylene-ethylene. These two reactants co-polymerize in a catalyst medium. The minor stream is catalyst waste from the Halar(R) batch reactor.

d. General Nature

This waste is primarily a liquid with some suspended solids (1 - 5%), comprised of entrained fine inert polymer product, carried through from the reactor through the dewatering process.

II a. Alpha Pinene (Spent)

- b. Composition - (See enclosed Data Sheet which is Attachment A(2)).

Little data exists on the composition of impurities remaining in the spent alpha pinene. However, in 1977, a suspected toxic component, perfluoroisobutylene (PFIB), was analyzed in the "before treated" spent alpha pinene and the "after treatment" spent alpha pinene and none was found to exist at or above the limit of detectability, 1 ppm.

c. Source/Origin

Virgin alpha pinene is introduced into three of the tetrafluoroethylene (TFE) distillation columns, to prevent autopolymerization (solidification) of the TFE monomer gas or liquid. As such, the alpha pinene contacts the TFE monomer, as well as certain low boiling and high boiling impurities, generated in the pyrolysis furnaces, upstream in the process. The used or spent alpha pinene exist the system at the still bottoms of a raw material recovery still. This spent alpha pinene is then transferred to a treatment tank, where it is heated by steam up to temperatures of about 350° F. Most of the impurities are driven off and vented to the atmosphere, leaving relatively pure alpha pinene. This material has a BTU value, approximately that of fuel oil.

d. General Nature

Spent alpha pinene is a liquid at standard conditions.

B. Haledon, New Jersey Facility

Available records indicate that the waste stream referred to in the answer to Question No. 2 for the former Allied facility located in Haledon, New Jersey comprised a waste product mixture that contained about 25% methanol, about 25% phosphoric acid and about 50% water.

4. I. As stated in the answer to Question #1, to the best of Allied's knowledge, information and belief, no Allied waste materials were transported to or disposed of at the Lone Pine Landfill.

II. A. Elizabeth, New Jersey Facility

See Attachment I for the amounts of waste materials apparently shipped by SCP from the Elizabeth facility. The Elizabeth plant was billed for 5,000 gallons of Halar water for loads less than this amount. Available documents indicate that only eight shipments were in excess of the 5,000 gallon minimum charge. The weigh tickets for the 7/20/77 and 8/19/77 transactions are missing, and therefore, the weights for these transactions are not included in the transaction summary. Documents associated with Halar water disposal by SCP for the Elizabeth plant during the second half of 1976 could not be located.

B. Haledon, New Jersey Facility

Available records indicate that, pursuant to a reclamation contract, Allied had the first right of refusal to purchase from SCP reclaimed phosphoric acid and methanol that was reclaimed from the Haledon, New Jersey waste stream comprising about 25% methanol, about 25% phosphoric acid and about 50% water. The available records indicate (probably using an outside "worst case" calculation) that SCP hauled about 550,000 gallons/year of the waste product mixture comprising methanol, phosphoric acid and water for Allied's former Haledon, New Jersey facility.

5. A. Elizabeth, New Jersey Facility

Halar water from the Elizabeth facility was shipped in bulk in tank trucks. Available records indicate that alpha pinene was shipped in 55 gallon drums. With respect to the 9/23/77 and 9/26/77 shipments of alpha pinene, an Elizabeth employee, Mr. Tom Eck, recalls that these shipments were removed in bulk via a vacuum truck. To the best of Mr. Eck's recollection, he recalls that SCP pumped the contents of the drums into a tank truck at the Elizabeth plant. Available records do not reflect this bulking of wastes and indicate shipment in drums.

B. Haledon, New Jersey Facility

The waste materials apparently hauled to SCP for reclamation of phosphoric acid and methanol are believed to have been transported in bulk.

6. I. As stated in the answer to Question #1, to the best of Allied's knowledge, information and belief, no Allied waste materials were transported to or disposed of at the Lone Pine Landfill.

II. A. Elizabeth, New Jersey Facility

Two transporters are indicated on the available records for the Elizabeth facility. SCP and a company identified as Energall that is believed to have hauled waste materials to SCP. Energall's address is also indicated as 411 Wilson Avenue, Newark, New Jersey on documents available to Allied.

B. Haledon, New Jersey Facility

Available records indicate that SCP hauled the waste materials from the former Haledon, New Jersey facility.

7. Available Allied documents will be produced upon request.
- (1) Not applicable
 - (2) Not applicable
 - (3) The 1977-1978 transaction documents and correspondence for the Elizabeth facility were submitted to the U.S. Attorney's office on November 16, 1981 in response to a subpoena regarding the grand jury investigation and prosecution of SCP principals. The 1976-1977 SCP transaction documents for the Elizabeth facility were submitted to EPA Region I on October 14, 1982 and on November 19, 1982 in response to an investigation of Picillo Pig Farm site located in Coventry, Rhode Island. The documents that indicate the former Allied facility in Haledon, New Jersey had dealings with SCP were only recently discovered.
8. See answer to Question #1.
9. Not applicable.

ALLIED CHEMICAL - Elizabeth, NJ / SCP Transactions

DATE SHIPPED	MATERIAL	QUANTITY *	SOLID/LIQUID	HAULER
2/17/76 ✓	Alpha Pinene C	78 drums	Liquid	SCP
2/18/76 ✗	Halar Water C	28,420 lbs (T/T)	"	"
3/2/76 ✗	Halar Water C	40,040 lbs (T/T)	"	"
3/10/76 ✗	Halar Water C	41,540 lbs (T/T)	"	"
3/22/76 ✗	Halar Water C	45,920 lbs (T/T)	"	"
3/30/76 ✗	Halar Water B	42,220 lbs (T/T)	"	"
4/6/76 ✗	Halar Water B	40,560 lbs (T/T)	"	"
4/13/76 ✗	Alpha Pinene N	80 → 74 drums	"	"
4/15/76 ✗	Halar Water	38,040 lbs (T/T)	"	"
4/28/76 ✗	Halar Water	42,660 lbs (T/T)	"	"
5/5/76 ✗	Halar Water N	46,980 lbs (T/T)	"	"
5/20/76 ✗	Halar Water N	38,760 lbs (T/T)	"	Energall
5/27/76 ✓	Halar Water N	46,720 lbs (T/T)	"	"
6/3/76 ✓	Halar Water N	39,360 lbs (T/T)	"	"
10/19/76 ✓	Halar Water N	46,120 lbs (T/T)	"	"

ALLIED CHEMICAL - Elizabeth, NJ / SCP Transactions

DATE SHIPPED	MATERIAL	QUANTITY*	SOLID/LIQUID	HAULER
1/6/77 ✓	Halar Water	48,540 lbs (T/T)	Liquid	Energall
1/26/77 ✓	"	41,760 lbs (T/T)	"	"
2/11/77 ✓	"	34,100 lbs (T/T)	"	SCP
2/17/77 ✓	"	31,120 lbs (T/T)	"	"
3/2/77 ✓	"	32,720 lbs (T/T)	"	"
3/3/77 ✓	"	34,840 lbs (T/T)	"	"
3/28/77 ✓	"	32,420 lbs (T/T)	"	"
4/1/77 ✓	"	35,580 lbs (T/T)	"	"
4/13/77 ✓	"	34,840 lbs (T/T)	"	"
4/26/77 ✓	"	32,720 lbs (T/T)	"	"
5/7/77 ✓	"	34,100 lbs (T/T)	"	"
5/17/77 ✓	"	38,260 lbs (T/T)	"	"
5/25/77 ✓	"	42,020 lbs (T/T)	"	"
6/2/77 ✓	"	35,220 lbs (T/T)	"	"
6/8/77 ✓	"	33,580 lbs (T/T)	"	"

ALLIED CHEMICAL - Elizabeth, NJ / SCP Transactions

DATE SHIPPED	MATERIAL	QUANTITY*	SOLID/LIQUID	HAULER
6/9/77 ✓	Halar Water	20,280 lbs (T/T)	Liquid	SCP
6/17/77 ✓	"	35,860 lbs (T/T)	"	"
6/23/77 ✓	"	35,740 lbs (T/T)	"	"
6/30/77 ✓	"	28,180 lbs (T/T)	"	"
7/8/77 ✓	"	36,200 lbs (T/T)	"	"
7/16/77 ✓	"	37,620 lbs (T/T)	"	"
7/20/77 ✓	"	NO WEIGHT	"	"
8/3/77 ✓	"	41,380 lbs (T/T)	"	"
8/10/77 ✓	"	31,900 lbs (T/T)	"	"
8/19/77 ✓	"	NO WEIGHT	"	"
8/25/77 ✓	"	40,880 lbs (T/T)	"	"
9/2/77 ✓	"	31,880 lbs (T/T)	"	"
9/13/77 ✓	"	43,402 lbs (T/T)	"	"
9/16/77 ✓	"	27,940 lbs (T/T)	"	"

ALLIED CHEMICAL - Elizabeth, NJ / SCP Transactions

DATE SHIPPED	MATERIAL	QUANTITY*	SOLID/LIQUID	HAULER
9/23/77 ✓	Alpha Pinene	80 drums	Liquid	SCP
9/26/77 ✓	Alpha Pinene	80 drums	"	"
9/29/77 ✓	Halar Water	40,860 lbs (T/T)	"	"
10/11/77 ✓	"	23,480 lbs (T/T)	"	"
10/13/77 ✓	"	40,100 lbs (T/T)	"	"
10/21/77 ✓	"	34,200 lbs (T/T)	"	"
10/24/77 ✓	"	25,140 lbs (T/T)	"	"
11/1/77 ✓	"	37,100 lbs (T/T)	"	"
11/7/77 ✓	"	32,200 lbs (T/T)	"	"
11/15/77 ✓	"	48,350 lbs (T/T)	"	"
11/18/77 ✓	"	46,800 lbs (T/T)	"	"
11/23/77 ✓	"	18,420 lbs (T/T)	"	"
11/29/77 ✓	"	38,740 lbs (T/T)	"	"
12/2/77 ✓	"	37,720 lbs (T/T)	"	"
12/13/77 ✓	"	45,740 lbs (T/T)	"	"
12/20/77 ✓	"	16,100 lbs (T/T)	"	"

ALLIED CHEMICAL - Elizabeth, NJ / SCP Transactions

DATE SHIPPED	MATERIAL	QUANTITY *	SOLID/LIQUID	HAULER
1/5/78 ✓	Halar Water	47,200 lbs (T/T)	Liquid	SCP
1/9/78 ✓	"	26,520 lbs (T/T)	"	"
1/13/78 ✓	"	23,740 lbs (T/T)	"	"
1/19/78 ✓	"	28,620 lbs (T/T)	"	"
1/27/78 ✓	"	30,140 lbs (T/T)	"	"
2/8/78 ✓	"	33,720 lbs (T/T)	"	"
2/13/78 ✓	"	22,420 lbs (T/T)	"	"
2/17/78 ✓	"	26,860 lbs (T/T)	"	"
2/22/78 ✓	"	30,520 lbs (T/T)	"	"
3/2/78 ✓	"	26,760 lbs (T/T)	"	"
3/8/78 ✓	"	38,640 lbs (T/T)	"	"
3/16/78 ✓	"	34,260 lbs (T/T)	"	"
3/22/78 ✓	"	33,160 lbs (T/T)	"	"
3/29/78 ✓	"	23,300 lbs (T/T)	"	"
4/3/78 ✓	"	39,920 lbs (T/T)	"	"
4/11/78 ✓	"	25,580 lbs (T/T)	"	"
4/11/78 ✓	"	37,540 lbs (T/T)	"	"

ALLIED CHEMICAL - Elizabeth, NJ / SCP Transactions

DATE SHIPPED	MATERIAL	QUANTITY*	SOLID/LIQUID	HAULER
4/26/78 ✓	Halar Water	32,880 lbs (T/T)	Liquid	SCP
5/5/78 ✓	"	35,480 lbs (T/T)	"	"
5/13/78 ✓	"	31,440 lbs (T/T)	"	"
5/17/78 ✓	"	16,300 lbs (T/T)	"	"
5/23/78 ✓	"	33,040 lbs (T/T)	"	"
6/1/78 ✓	"	36,580 lbs (T/T)	"	"
6/8/78 ✓	"	37,700 lbs (T/T)	"	"
6/16/78	"	37,040 lbs (T/T)	"	"
6/21/78 ✓	"	25,320 lbs (T/T)	"	"
6/28/78 ✓	"	38,080 lbs (T/T)	"	"
7/12/78 ✓	"	36,600 lbs (T/T)	"	"
7/26/78 ✓	"	45,640 lbs (T/T)	"	"
8/7/78 ✓	"	39,500 lbs (T/T)	"	"
8/16/78 ✓	"	24,520 lbs (T/T)	"	"
8/28/78 ✓	"	25,820 lbs (T/T)	"	"
9/1/78 ✓	"	13,340 lbs (T/T)	"	"

*Tank Truck (in bulk)

ATTACHMENT A - Elizabeth, New Jersey

1. See Allied Corporation response to EPA information request dated June 28, 1984 in connection with the Lone Pine Landfill (copy attached as Attachment A-1).
2. See answer to Question No. 1.
3. See answer to Question No. 1.
4. Documents are attached to Attachment A-2.
5. See answer to Question No. 1.
6. To the best of Allied's knowledge, information and belief, none.
7. J. T. Eck - Allied Corporation - Elizabeth, New Jersey
J. Gull - Allied Corporation - Elizabeth, New Jersey
D. R. Fitts - former Allied employee now employed by Arco Chemical in Philadelphia, Pennsylvania.
Former SCP employees.
8. Allied has no evidence that will enable it to answer this question.
9. See answer to Question No. 8.